

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NHC LLC, a Florida limited liability
company,

Plaintiff,

v.

No. 19-cv-06332

CENTAUR CONSTRUCTION COMPANY
INC., an Illinois corporation, SPIRO
TSAPARAS, and PETER ALEXOPOULOS,

Honorable Matthew F. Kennelly

Defendants.

**PLAINTIFF/JUDGMENT CREDITOR'S MOTION FOR LEAVE TO FILE CERTAIN
DOCUMENTS UNDER SEAL**

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Plaintiff/judgment creditor NHC LLC (“NHC”), by its undersigned counsel, hereby moves pursuant to Local Rule 26.2 for leave to file under seal certain email exchanges produced by citation respondent M Development, LLC (“M Development”). In support hereof, NHC states as follows:

1. On July 22, 2020, the Court entered an Agreed Confidentiality Order governing the production of confidential information in this matter. (Dkt. No. 80.)

2. On March 15, 2023, the Court entered an amended judgment (“Judgment”) against defendants Centaur Construction Company Inc., Spiro Tsaparas (“Tsaparas”), and Peter Alexopoulos jointly and severally in the total amount of \$22,272,124.34 for fraud, plus punitive damages against each of Defendants individually. (Dkt. No. 228.)

3. In post-Judgment proceedings, NHC served a Third Party Citation to Discover Assets on M Development, pursuant to which M Development made several partial document productions. Among the documents produced by M Development are: (i) an email exchange with the most recent email dated May 12, 2025, between Tsaparas, Nancy Turken (“Turken”) of M Development and Mark Hunt of M Development; and (ii) an email exchange with the most recent email dated December 30, 2022, between Turken and Eric Fogel, an equity partner at Amundsen Davis. M Development designated both email exchanges as “Confidential” under the Agreed Confidentiality Order.

4. On September 8, 2025, NHC filed its reply in support of motion to compel production of documents by citation respondents M Development, LLC and M Sourcing, LLC. (Dkt. No. 801.) The above-referenced email exchanges are attached to NHC’s reply brief as exhibits 31 and 34, respectively. (Dkt. Nos. 801-1, 801-4.)

5. Prior to filing its reply brief, the undersigned contacted counsel for M Development to request permission to publicly file the above-referenced email exchanges. In that correspondence the undersigned stated that NHC did not believe either of the email exchanges contained information which necessitated filing the email exchanges under seal. In response, counsel for M Development disagreed and stated that both email exchanges should be filed under seal because they contain commercial and financial information that M Development has maintained as confidential.

6. Accordingly, because M Development has designated the email exchanges as “Confidential” pursuant to the Agreed Confidentiality Order, NHC seeks leave to file the email exchanges under seal.

7. NHC has publicly filed its reply in support of motion to compel production of documents by citation respondents M Development, LLC and M Sourcing, LLC, with slip sheets as exhibits for the above-referenced email exchanges in order to minimize the amount of NHC’s filing sought to be filed under seal. (Dkt. No. 801.) Additionally, NHC has provisionally filed under seal its reply, inclusive of the email exchanges. (Dkt. No. 803.)¹

8. The Court’s Standing Order provides that “[i]n any case in which Judge Kennelly permits filing under seal, an unredacted version of the entire filing, including all exhibits, must be filed under seal, and a redacted version that omits the sealed portions must be filed in the public record.” Accordingly, NHC seeks leave to file its Response with all exhibits under seal pursuant to the Court’s Standing Order.

WHEREFORE, for the above and foregoing reasons, NHC LLC respectfully requests that this Court enter an Order as follows:

¹ NHC has also provisionally filed under seal the email exchanges separately. (Dkt. No. 802.)

(i) granting NHC leave to file under seal the email exchanges currently provisionally filed under seal (Dkt. No. 803); and

(ii) granting NHC such other, further, or additional relief in its favor as this Court deems fair, just, and equitable.

Dated: September 15, 2025

Respectfully submitted,

NHC LLC

By: /s/ Zachary J. Watters

One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that, on September 15, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record.

Additionally, I hereby certify that, on September 15, 2025, a true and correct copy the foregoing was served on the following individuals and entities in the manner indicated below:

Spiro Tsaparas
Via email to spiro@msourcingllc.com

Peter Alexopoulos
Via email to peter@srtrainingllc.com

Centaur Construction Company
Via U.S. First Class Mail
Illinois Secretary of State
501 S. Second St., Suite 328
Springfield, IL 62756

/s/ Zachary J. Watters
An Attorney for NHC LLC